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OF COUNSEL TO  
CONLON, FRANTZ,  
PHELAN & PIRES

February 4, 1998

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

RECEIVED

FEB - 4 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: MM Docket No. 97-234  
GC Docket No. 92-52  
GEN Docket No. 90-264  
Implementation of Section 309(j)  
of the Communications Act  
**Resubmission of Timely-Filed Comments**  
**of Dorisann L. Eckols**

Madame Secretary:

Submitted herewith, on behalf of Dorisann Eckols, licensee of Station KAML(AM), Kenedy, Texas ("KAML") are five copies of its Comments, initially filed on January 23, 1998, in connection with the referenced Rulemaking proceeding. **The Commission is already in possession of the original, which was timely filed on January 23, 1998.**

A check yesterday of the agency's files by the undersigned revealed that KAML's Comments were not in the Rulemaking docket. Annexed hereto is a U.S. Post Office Domestic Return Receipt for Registered Mail. It bears the date January 23, 1998 and the signature of a Commission employee. **The Comments were timely filed.**

Kindly associate KAML's thoughtful Comments with the Rulemaking proceeding. They were filed by a licensee with hard experience in actually operating a rural broadcast station, they bring to the FCC's attention an important perspective all too

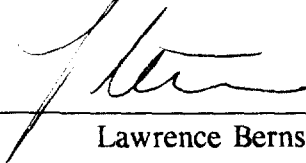
Federal Communications Commission  
February 4, 1998  
Page 2

often ignored in matters like this one, will assist the Commission in its deliberations and clearly deserve consideration on their merits.

Should there be any questions concerning this matter, please contact the undersigned licensee counsel.

Respectfully submitted,

**KARNES BROADCASTING, INC.**

By:   
Lawrence Bernstein

Its Attorney

Encl.

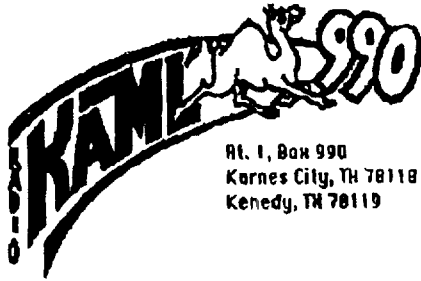
cc: Ms. Dorisann Eckols

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<b>SENDER:</b> ■ Complete Items 1 and/or 2 for additional services. ■ Complete Items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: <i>Fed. Communications Comm.</i> <i>1419 M. St. NW</i> <i>Washington DC 20534</i> <i>FOC 111</i>	4a. Article Number: <i>EE00998677575</i>	
5. Received By: (Print Name) <i>X [Signature]</i>	4b. Service Type <input checked="" type="checkbox"/> Registered <input type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Receipt for Merchandise <input type="checkbox"/> COD 7. Date of Delivery <i>JAN 27 1994</i>	
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PS Form 3811, December 1994 102585-97-2-0179 Domestic Return Receipt

Thank you for using Return Receipt Service.



January 22, 1998

Federal Communications Commission  
1919 M Street N.W.  
Washington D.C. 20554

Dear Federal Communications Commission:

Thank you for allowing my enclosed comments relative rulemaking and use of either auction or comparative hearing to dispose of backlogged applications.

Feelings and emotions are not a part of consideration. However, it is difficult to exclude them when you have invested your lifes savings and 7 years of your life operating a small 250 watt local radio station as a service to the area community without recompense.

When my 250 watt KAML-AM powers down to 70 watts at sunset until sunrise as required, XET in Monterrey, Mexico, 300 miles South, drowns KAML out in our own parking lot. We are unable to provide our audience with emergency weather alerts, news, broadcast of local high school night sports events, and other needed community broadcast programming.

I have not applied for a multitude of a frequencies as others do to sell them for profit. I am not collecting frequencies like trophies. I have applied for only one in my hometown to serve my area communities in "the public interest, convenience, and necessity", which is the unifying thread of the Communications Act of 1934.

Both I and my KAML-AM radio station are solvent and pay bills timely. I am not interested in getting into auction for FM276C2 that will bankrupt the operating structure of KAML and me personally or cause a financial hardship, nor can I win such. It is the purpose, committment, and responsibility of the Federal Communications Commission to grant license and regulate radio and television operation in the best public interest rather than in the interest of applicants who would opportunistically profit by licensing.

I propose that the Commission use comparative hearing to decide license for rural radio stations when the County of license is less than 50,000, when one or more of the applicants is a local resident with broadcast experience, and when the license at issue will be used to provide the primary audience area with programming of local interest not otherwise available.

Sincerely,

Dorisann L. Eckols  
Karnes Broadcasting & Radio KAML

COMMENTS AS APPLICABLE  
TO THE FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554  
AS RELATED TO AND IN THE MATTER OF:

Implementation of Section 309(j)	)	
of the Communications Act;	)	
Competitive Bidding for Commercial	)	MM Docket No. 97-234
Broadcast and Instructional Television	)	
Fixed Service Licenses	)	
Reexamination of the Policy Statement	)	GC Docket No. 92-52
on Comparative Broadcast Hearings	)	
Porposal to Reform the Commission's	)	
Comparative Hearing Process to Expedite	)	GEN Docket No. 90-264
the Resolution of Cases	)	

Pursuant:  
Notice of Proposed Rulemaking, FCC 97-397, November 25, 1997  
And Errata Released December 11, 1997

COMMENTS OF DORISANN L. ECKOLS

INTRODUCTION TO COMMENTS:

Dorisann L. Eckols is the trustee/licensee in good standing with The Federal Communications Commission of license to operate 250 watt AM Radio Station KAML, Kenedy/Karnes City, Texas.

Dorisann L. Eckols is also President and majority stockholder of Karnes Broadcasting, Inc., applicant for FM276C2 Karnes City, Texas, as allocated by the Commission in December, 1995 by request of Karnes Broadcasting, to wit Karnes Broadcasting did provide the Commission with necessary frequency search and engineering data relative FM276C2.

Dorisann L. Eckols is a tenured school teacher and lifelong resident of Karnes County, Texas whose interest in purchasing the broadcast facilities of Radio Station KAML in 1991, and in acquiring FM 276C2 as allocated to Karnes City, Texas is one of public service and community interest.

DISCUSSION:

In its Proposed Rulemaking adopted November 25, 1997, the Commission proposes "to use auctions to decide among competing applications filed before July 1, 1997 for new commercial radio and television broadcast stations", concluding that resolving the latter cases by competitive bidding procedures rather than comparative hearings "better serves the public interest". However, 309(j)(1) provides exception "for certain commercial broadcast applications filed before July 1, 1997", and "broadcast service expressly exempted from the Commission's auction authority under section 309(j)(2)".

COMMENTS OF DORISANN L. ECKOLSDISCUSSION: (continued)

In ex-Commissioner Reed Hundt's "Hard Road Ahead", Mr. Hundt proposed Congress allow use of auctions to resolve settlement of competing license applications. However, in his address relating use of comparative hearings, Mr. Hundt stated "If spectrum is to be given away at no charge, this option at least provides the public with assurance that its property is going to those (who) would return the most in terms of public interest programming otherwise not provided by the marketplace". Mr. Hundt goes on to remark on removing "economic barriers", and that "small and entrepreneurial businesses deserve special attention to remove barriers".

In a letter dated January 9, 1997 from Senator John McCain to then Commissioner Reed Hundt, Senator McCain expresses his intention to introduce legislation to allow the FCC to use auction to decide licensing. In his letter, Senator McCain said "In my judgement it would be unconscionable for the Commission to give away new television and radio licenses without a guarantee that the public would receive the benefits to which it is entitled for use of its property". Senator McCain's letter is non-conforming if not ambiguous.

The Communications Act of 1934, to which every amendment thereafter refers, establishes the philosophical and legal foundations upon which the Federal Communication Commission is established. This important law presents that the airways are public property licensed to broadcasters, and that the main use will be whether the broadcaster "serves the public interest, convenience, and necessity". In fact, in Notice of Proposed Rulemaking, FCC 97-397, use of the language "service to the public" or "public interest" is used eleven (11) times in the first eleven (11) pages.

FCC General Action Report No. GN 97 alludes to FCC's new authority to auction broadcast licenses pursuant to The Balanced Budget Act of 1997. It goes on to say "The statute includes an exception for competing applications for full service stations filed before July 1, 1997", and that "for these pending cases, the statute says that the Commission 'shall have the authority' to use auctions." Note that competitive bidding is not mandated. B-13 of Notice of Proposed Rulemaking seeks comment on whether the Balanced Budget Act of 1997 should be "construed" to require auctions for pre-July 1, 1997 applications, and goes on to say "we assume that we have discretion regarding the use of auctions to resolve exclusive applications filed before July 1, 1997. Key words here are "construed" and "assume".

(continued on page 3)

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-3-

Washington, D.C.

**COMMENTS OF DORISANN L. ECKOLS****DISCUSSION** (continued)

Continuing with discussion of General Action Report No. GN 97, in a Separate Statement of Honorable Commissioner Gloria Tristani, (exhibit A attached) Commissioner Tristani supports "implementation of the Balanced Budget Act of 1997 by proposing rules for auctions to resolve initial broadcast license proceedings involving mutually exclusive applications filed after June 30, 1997 in keeping with the Balanced Budget Act of 1997". Commissioner Tristani goes on to say "it is important for the Commission to promulgate rules that meet all of its obligations under Section 309. In particular, Section 309(j)(4)(D), which was unaffected by the Balanced Budget Act, directs the Commission to promulgate auction rules that ensure that small businesses, rural telephone companies, and business owned by minority groups and women are giving the opportunity to participate in the provision of spectrum-based services". Commissioner Tristani said "I wish to stress, however, that I am open to proposals to use comparative criteria for some or all of these pending cases. Although comparative hearings may not dispose of such cases as quickly as auctions, I believe that certain equities or other public interest considerations may be involved that would make it inappropriate to subject them to competitive bidding".

Commissioner Tristani's concerns are well founded and should be considered.

In Proposed Rulemaking (FCC 97-397), B-18 on page 9, the Commission cites advantages of auction over comparative hearing as "allocating spectrum to those valuing it the most and best able to serve the public". By "valuing it the most", the Commission clearly means monetary value. Thus, combining the language "valuing it the most" and "best able to serve the public" is antithetic and antonymous. Use of auction to determine license will grant license to "those valuing it the most" ... period. "Valuing" and "best able" are not synonymous. Only use of comparative hearing will determine who is "best able to serve the public".

The Commission has expressed a concern for "maximum diffusion of control of the media or mass communications". Use of auction to grant license in the case of every application is antithetic to that concern. A hypothetical, but very possible scenario under provisions of auction of license is: Dorisann L. Eckols owns a small market rural 250 watt stand-alone AM radio station adjacent to the San Antonio market area. This small AM station has a history of service to the public in its rural small population audience area. Mrs. Eckols has audience complaints of interference by a Mexico station on the same frequency. Mrs. Eckols initiates allocation of an FM to her AM city of license, and applies for the FM station to be a "sister station" to correct the interference problem. Dorisann L. Eckols owns no other broadcast interests.

(continued on page 4)

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-page 4-

Washington, D.C.

COMMENTS OF DORISANN L. ECKOLSDISCUSSION (continued)

Now, hypothetically, comes say Cox Radio, who now owns eight (8) radio stations in the San Antonio market with an option to buy a ninth. Suppose Cox Radio, who just bought KONO AM-FM in Helotes in the San Antonio market for a reported \$23 million, (see exhibit B) decides it wants FM276C2 in Karnes City at auction? Mrs. Eckols does not have a chance of winning FM276C2 Karnes City, Texas at auction.

The above scenario is similar to the application of John C. Carsey, who is a competing applicant to Dorisann Eckols for FM276C2. Mr. Carsey has applied for fifteen (15) other radio and television licenses nationwide. A second competing applicant is Humberto Lopez, who owns several other radio stations and LPTV's with several other applications pending. See exhibits C and D enclosed herein.

Mrs. Eckols only wants, and has only one application pending. That of FM276C2 as allocated to her AM city of license as an FM sister station to AM KAML.

If the Commission allows competing applications for FM 276C2 to be decided by auction, each applicant should be required to prove financial responsibility at realistic figures to build and operate every application they have pending before the Commission before being allowed to bid on any application.

To that end, the Commission's concern for "maximum diffusion of control of the media or mass communications" as it relates to FM276C2 may be resolved.

I do not object to use of auction to settle many license cases now before the Commission. There are pending multiple applications for license in markets with dense metropolitan audience population, and where the competing applicants are equal in qualification. Those should be settled by auction.

Small market rural applications filed before July 1997 should be looked at on an individual basis in comparative hearing to determine: 1) if granting of license will best serve the rural communities it will serve, 2) is the applicant a resident of the community with demonstrated community interest, 3) is this a long term commitment to serve a community public need, 4) is the applicant experienced in radio broadcasting, 5) is this application to improve community and public service by adding an AM or FM to an existing stand-alone station ownership, 6) is the applicant a small entrepreneurial locally owned business that will "do business" within the community, and 7) is the applicant the originator of frequency allocation, or is the applicant an opportunist.

These criterion should be considered, and are provable by affidavit and testimony.

(continued on page 5)



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- page 5-

Washington, D.C.

COMMENTS OF DORISANN L. ECKOLSBACKGROUND:

In 1991, Dorisann Eckols bought stand-alone AM Radio Station KAML when it was in danger of closing for financial reasons.

Dorisann L. Eckols is a lifelong resident of Karnes County and a school teacher. She is married to Clyde S. Eckols. She has two sons and a daughter. The daughter is married, mother of 3, lives in Karnes County and is also a school teacher. One son is career military intelligence, now stationed in Washington, D.C. after several overseas assignments, and was awarded Theater Serviceman of the Year. Son Steve is married with 3 children, wife is a school teacher. Steve Eckols is a licensed radio engineer with broadcasting experience, and operates Radio KAML assisted by Dorisann's husband and family father Clyde S. Eckols, who is also tenured and experienced in radio station operation.

KAML AM is 250 watts daytime with reduced power to 70 watts pre-sunrise and post sunset. KAML is unable to serve its communities of license pre-sunrise or post sunset due to significant interference by XET in Monterrey, Mexico, to include broadcast of local high school sports, news, weather, community event announcements, and other programming of local interest. For example, on January 17, 1998, KAML attempted to broadcast live to promote the Karnes County 4-H and FFA Youth Show livestock auction, to which KAML donated all sponsor broadcast revenue. KAML was unable to do so due to Mexico station interference. What Karnes Broadcasting wants is a sister FM to KAML AM that will reach approximately the same coverage area of KAML AM ... without interference.

Humberto Lopez is a competing applicant for FM276C2. Mr. Lopez owns several radio and LPTV stations, and has applications pending for several more to include FM 255C2 Dilley, Texas in the San Antonio market area. See exhibit D. Mr. Lopez has explained to Karnes Broadcasting that his intention is to broadcast Hispanic Religious on FM276C2 Karnes City in an effort to reach San Antonio, Texas. The Lopez-Dilley, Texas application will accomplish that. This is a market and format well covered and provided for pursuant his other applications.

Mr. Carsey is an Austin, Texas attorney who has filed applications for 15 other radio and television licenses (see exhibit C). Mr. Carsey has offered Karnes Broadcasting \$75,000 cash and a non-compete agreement to KAML AM for Karnes Broadcasting to withdraw application for FM276C2 Karnes City in his favor. Mr. Carsey's representatives have explained to Karnes Broadcasting in telephone conversation that it is his intention, if the successful applicant for FM276C2 Karnes City, only to build a tower and transmitter with no facilities, no phones, no employees, and no community service or local business advertising.

continued on page 6

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-6-

Washington, D.C.

## COMMENTS OF DORISANN L. ECKOLS

BACKGROUND: (continued)

My KAML-AM majority audience and advertisers are in Karnes County, Texas, with a population of under 12,000. A TIGER census map is enclosed as exhibit E. KAML has some audience in Goliad, DeWitt, Bee, Wilson and Live Oak counties with a combined population of possibly 69,000. The area is rural agriculture with no manufacturing and declining retail business as pictorially documented in exhibits enclosed for illustration purposes.

Radio KAML competes for audience with metropolitan San Antonio radio stations, and competes with local KTNR-FM in Kenedy for revenue in a market that barely supports one radio station. Area audience and advertising available in the Karnes and surrounding county area will not support 3 separately owned radio stations licensed to Karnes County, Texas. Ie: KAML-AM, KTNR-FM and FM276C2.

RATIONAL AND PROPOSAL:

Post July 1997 applications should be disposed of at auction. Major market high audience density metropolitan applications, both pre and post July 1997 should be disposed of at auction because there will be little difference in service to the public.

Small market rural license applications, filed pre July 1997, should be disposed of on the basis of public service criterion in comparative hearing. There should be a definition between rural and metropolitan radio. Metropolitan are those stations that serve the larger cities. Rural are those small locally owned entrepreneurial stations that service a home community and a few surrounding county communities. By service, we intend to mean actual audience, not an unreal census of possible audience upon which a station pays FCC a regulatory fee.

Karnes Broadcasting probably has a real audience potential of not more than 100,000, and gross annual revenue of about \$100,000 as an AM/FM combo. Thus, the Commission might categorize rural radio stations as those that fall within these parameters, and should exempt those small rural radio station applications from auction in favor of comparative hearing.

Such may be accomplished by Commission ruling that there is a distinct difference in terms of broadcast service to the public on a market need basis. And, that radio license applications that are determined to serve small rural markets, and that were filed pre July 1997, shall be exempt from auction proceedings, and will be heard in comparative hearing.

To wit, I pray the Commission will consider the foregoing comments in its decision relative disposal of pending license applications.

-END OF COMMENTS-

DORISANN L. ECKOLS - KARNES BROADCASTING, INC.  
APPLICANT FOR FM276C2- KARNES CITY, TEXAS

November 25, 1997

**Separate Statement of Commissioner Gloria Tristani**

*Re: In the Matter of Implementation of Section 309(j) of the Communications Act – Competitive Bidding for Commercial Broadcast and Instructional Fixed Television Service Licenses (MM Docket No. 97-00), Reexamination of the Policy Statement on Comparative Broadcast Hearings (GC Docket No. 92-52), and Proposals to Reform the Commission's Comparative Hearing Process to Expedite the Resolution of Cases (GEN Docket No. 90-264).*

I support today's action to implement the Balanced Budget Act of 1997 by proposing rules for auctions to resolve initial broadcast license proceedings involving mutually exclusive applications filed after June 30, 1997. I believe that the auction rules proposed in the Notice faithfully reflect the Balanced Budget Act's amendments to Section 309 of the Communications Act and will ensure an expeditious resolution of mutually exclusive application proceedings.

At the same time, however, I believe it is important for the Commission to promulgate rules that meet all of its obligations under Section 309. In particular, Section 309(j)(4)(D), which was unaffected by the Balanced Budget Act, directs the Commission to promulgate auction rules that ensure that small businesses, rural telephone companies and businesses owned by minority groups and women are given the opportunity to participate in the provision of spectrum-based services. This provision is in keeping with Congress' and the Commission's longstanding commitment to promoting minority ownership of mass media outlets. I too am firmly committed to advancing that goal because, among other reasons, I believe that diversity of ownership is one of the best ways to ensure that all points of view are heard in the vital public debates that take place over our public airwaves. In this regard, I am deeply concerned that minority ownership of broadcast stations has declined from 3.07 percent in 1995 to 2.81 percent in 1996-97. I will be especially interested in reviewing proposals designed to reverse this trend, as well as proposals designed to meet the Commission's specific obligations under Section 309(j)(4)(D), in a fair, workable and judicially sustainable manner.

The Notice also proposes rules for resolving the hundreds of pending comparative licensing proceedings that have been stayed by the Commission in the wake of the Bechtel II decision. I believe that the Commission should make every effort to resolve these cases – many of which have been pending for several years – as quickly as possible. That is why I am prepared to join in the tentative conclusion that auctions may be the best way to resolve this limited set of cases. I wish to stress, however, that I am open to proposals to use comparative criteria for some or all of these pending cases. Although comparative hearings may not dispose of such cases as quickly as auctions, I believe that certain equities or other public interest considerations may be involved that would make it inappropriate to subject them to competitive bidding.

**EXHIBIT A TO COMMENTS OF DORISANN ECKOLS**

## Barger sells San Antonio stations

In a surprise announcement, John Barger, owner of Barger Broadcast Brokerage and the Texas Association of Broadcasters' 1997 Pioneer Broadcaster of the Year, sold his San Antonio radio stations.

Cox Radio acquired KONO AM-FM Helotes for \$23 million. Additionally, Cox secured an option to purchase KRIO-FM in the future.

Cox Radio now owns eight radio stations in the San Antonio market, for a total of 54 stations in 12 markets nationwide.

Cox's other San Antonio stations include KCJZ-FM, KCYX/KKYX, KISS-FM, KLUP/KSMG.

The sale marks Barger's departure from



John Barger

Texas radio ownership.

His career spans almost 40 years and covers all aspects of the broadcast industry from legal to engineering to management to on-air broadcasting.

Barger served as president of the Texas Association of Broadcasters in 1986-87 and as a member of TAB's Board of Directors for six years.

Currently, Barger represents South Texas on

the National Association of Broadcasters' Board of Directors.

The KONO deal is expected to close in the first half of next year, and Cox plans to sell or swap the KRIO option sometime in 1998.

## EXHIBIT B TO COMMENTS OF DORISANN ECKOLS

**North American Broadcasting Company  
Application for FM Construction Permit  
Karnes City, Texas**

**EXHIBIT 1  
Other Broadcast Interests**

North American Broadcasting Company has the following pending applications on file:

• Healdsburg, California	FM Channel 244A	BPH-960111MY
• Winona, Texas	FM Channel 274A	BPH-960222MH
• Sun Valley, Nevada	FM Channel 233C2	BPH-960930MK
• Grants, New Mexico	FM Channel 288C	BPH-961118M5
• Fairbault, Minnesota	FM Channel 298C2	BPH-961118M6
• Farmersville, Texas	FM Channel 221A	BPH-970401MN
• Virginia Beach, Virginia	TV Channel 21	BPCT-961001LV
• Tallahassee, Florida	TV Channel 24	BPCT-961001KX
• Houston, Mississippi	TV Channel 45	BPCT-961001KY
• Norman, Oklahoma	TV Channel 46	BPCT-961001LU
• Walla Walla, Washington	TV Channel 9	BPCT-961001KZ
• Eureka Springs, Arkansas	TV Channel 34	BPCT-961001LT
• Price, Utah	TV Channel 3	BPCT-961001LK
• Kailua, Hawaii	TV Channel 50	no file no. assigned
• Grand Forks, N.D.	TV Channel 27	no file no. assigned

Timothy Timmerman is the President and sole shareholder of TCSI Huntsville, Inc. which owns and operates CATV systems in Walker and Trinity County, Texas. Mr. Timmerman has no other mass media interests.

The Honorable Leticia Hinojosa, the managing member of Transpac Media, LLC, has no other mass media interests.

Transpac Media, LLC has no other mass media interests.

Rudy Tomjanovich has no other mass media interests.

**EXHIBIT C TO COMMENTS OF DORISANN ECKOLS**

EXHIBITS TO COMMENTS OF DORISANN L. ECKOLS  
RELATIVE LICENSE OF FM276C2 - KARNES CITY, TEXAS

IN HIS EXHIBITS TO APPLICATION FOR FM276C2 KARNES CITY,  
TEXAS, HUMBERTO LOPEZ HAS CITED:

HUMBERTO LOPEZ IS A 51 PERCENT GENERAL PARTNER IN COTTON  
BROADCASTING, LICENSEE OF STATION KMIQ(FM),  
ROBSTOWN, TEXAS, AND STATION KINE(AM), KINGSVILLE, TEXAS.  
MINERVA R. LOPEZ, WIFE OF HUMBERTO LOPEZ IS A 25 PERCENT  
PARTNER IN COTTON BROADCASTING. CARLOS LOPEZ, SON OF  
HUMBERTO LOPEZ IS A 24 PERCENT PARTNER.

HUMBERTO LOPEZ D/B/A BENAVIDES COMMUNICATIONS IS PERMITTEE  
OF STATION KXTM(FM), BENAVIDES, TEXAS.

HUMBERTO LOPEZ D/B/A DILLEY BROADCASTERS IS AN APPLICANT FOR  
A NEW CONSTRUCTION PERMIT FOR AN FM STATION ON CHANNEL 255C2  
AT DILLEY, TEXAS (FILE NO. BPH-930208MD).

HUMBERTO LOPEZ D/B/A SEVENTH DAY CHRISTIAN GROUP IS AN  
APPLICANT FOR A NEW CONSTRUCTION PERMIT FOR AN FM STATION  
ON CHANNEL 239A AT JOURDANTON, TEXAS (FILE NO. BPH-930601MF).

HUMBERTO LOPEZ D/B/A/ FOUR M.L. BROADCASTING IS AN APPLICANT  
FOR A NEW FM STATION AT GEORGE WEST, TEXAS (FILE NO.  
BPH-940207MA)

HUMBERTO LOPEZ WAS A PARTNER IN LOMAR BROADCASTING,  
APPLICANT FOR A BROADCAST STATION AT LAREDO, TEXAS.  
APPLICATION DISMISSED PURSUANT TO SETTLEMENT.

HUMBERTO LOPEZ IS ALSO AN APPLICANT FOR LPTV CHANNEL 31 AT  
VICTORIA, TEXAS.

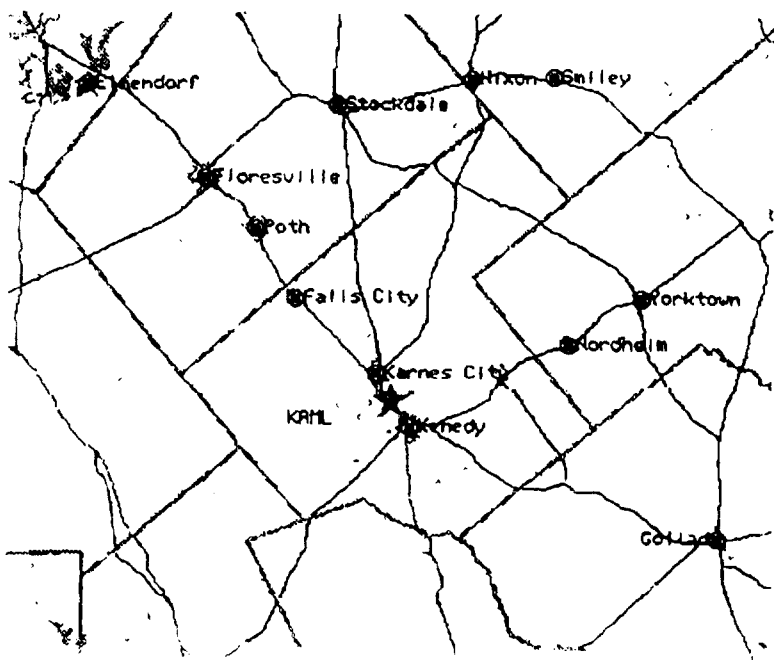
HUMBERTO LOPEZ IS ALSO AN APPLICANT FOR LPTV CHANNEL 26,  
KINGSVILLE, TEXAS AND LPTV STATION K21DZ, SAN ANTONIO, TEXAS.

MINERVA LOPEZ IS THE PERMITTEE OF LPTV STATION K33ES, ALICE,  
TEXAS AND LPTV CHANNEL 26, ARANSAS PASS, TEXAS. SHE ALSO HAS  
AN APPLICATION PENDING FOR LPTV CHANNEL 40, MATHIS, TEXAS.

MR. LOPEZ, IN HIS APPLICATION FOR FM276C2, SAYS "K.C. RADIO WILL  
PROVIDE A PROGRAM SERVICE RESPONSIVE TO THE ASCERTAINED  
PROBLEMS, NEEDS, AND INTEREST OF KARNES CITY AND THE  
SURROUNDING SERVICE AREA.

HOWEVER, MR. LOPEZ PLANS TO BROADCAST HISPANIC CHRISTIAN  
PROGRAMMING DESIGNED TO REACH INTO THE SAN ANTONIO MARKET  
WITH NO ATTENTION TO THE PUBLIC SERVICE AND COMMUNITY SERVICE  
NEEDS OF KARNES CITY, OR KARNES AND SURROUNDING AREAS.

EXHIBIT D TO COMMENTS OF DORISANN ECKOLS



## EXHIBIT E TO COMMENTS OF DORISANN ECKOLS